

## Applicant Details

First Name	Karolyne
Middle Initial	E
Last Name	Carloss
Citizenship Status	U. S. Citizen
Email Address	<a href="mailto:kcarloss@utexas.edu">kcarloss@utexas.edu</a>
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Contact Phone Number	7135621403

## Applicant Education

BA/BS From	Loyola University Chicago
Date of BA/BS	May 2014
JD/LLB From	The University of Texas School of Law
	<a href="http://www.law.utexas.edu">http://www.law.utexas.edu</a>
Date of JD/LLB	May 4, 2024
Class Rank	School does not rank
Law Review/Journal	Yes
Journal(s)	Texas Law Review
Moot Court Experience	No

## Bar Admission

## Prior Judicial Experience

Judicial Internships/ Externships	No
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Post-graduate Judicial Law Clerk      **No**

**Specialized Work Experience**

**Recommenders**

Dickerson, Mechele  
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**This applicant has certified that all data entered in this profile and any application documents are true and correct.**

June 11, 2023

The Honorable Alfred Bennett  
Bob Casey United States Courthouse  
515 Rusk Street, Room 8631  
Houston, TX 77002-2600

Dear Judge Bennett:

Karolyne Carloss has asked me to write a letter to support her clerkship application. As a student in my Federal Civil Procedure class, I enthusiastically support her desire to become a judicial law clerk and highly recommend her to you.

Karolyne was a first-year law student in my Federal Civil Procedure class in Spring 2022. This was an odd semester (for 1L students and professors) for several reasons. First, it was an unusually large class of over one hundred students. This made it harder for me to become as familiar with the students in that class as I have with students in other classes I have taught. In addition, the courses started fully remote (because of COVID-Omicron), returned in person for a week, returned to remote because of weather issues, then returned in person for the rest of the semester.

I continued to teach using the Socratic method, despite these disruptions, so students were “on call” in every 4-5 classes. Because students were masked for most of that semester, though, it was harder for me to “get to know” students. I remember Karolyne, however. She frequently and passionately spoke in class even when she was not on call. In addition, she seemed genuinely intellectually curious about the “why” of civil procedure, and questions she asked both in class and during office hours indicated to me that she had a deep desire to learn the materials we covered in class. This, of course, is unusual because (as I am sure you know) Civ Pro is generally the least-liked course in the first-year curriculum!

Over the course of that semester and in discussions I've had with her this spring (I was on leave in Fall 2020), I came to see that Karolyne's well-thought-out questions and her energy for learning complex concepts stemmed from her professional and volunteer community experiences in Africa, India, and west Texas. The way she engaged with her peers and her overall demeanor derived, I believe, from her prior civic experiences. In Karolyne's communication skills are suburb and she performed extremely well in the class, earning an “A” in civ pro that spring.

Karolyne regularly attended my office hours where she asked follow-up questions about the matters we covered in class and we talked about her goals and aspirations. Given her demonstrated natural energy and legal interests, along with her active participation in community and civic activities, Karolyne's desire to become either a civil plaintiff or criminal defense lawyer does not surprise me. I think she will flourish in these areas, should she ultimately decide to take that career path.

I last saw Karolyne at a January luncheon for a conference sponsored by the Texas Law Review. I invited her to join me for lunch at a table that included only law professors. Because the lunch discussion was becoming somewhat droll (to me, at least), I mentioned to the table that Karolyne was interning at the Capital, and asked her to describe some of the bills pending in the legislature. As her former professor, I was delighted to witness the ease with which Karolyne objectively and neutrally described proposed bills that absolutely horrified the professors from law schools in New York and New England. As the law professors argued about the likely unconstitutionality of some of the bills, Karolyne listened then moved on to describing the next bill! The non-UT professors were impressed with her maturity, and I was delighted to show off one of UT's finest.

Karolyne Carloss will be a terrific, inquisitive and amiable addition to any judge's chambers. I recommend her with no reservations and would be happy to discuss her in more detail if you would like.

Respectfully,

A. Mechele Dickerson  
Arthur L. Moller Chair in Bankruptcy Law and Practice  
University Distinguished Teaching Professor  
The University of Texas School of Law

Mechele Dickerson - mdickerson@law.utexas.edu - 512-232-1311

June 11, 2023

The Honorable Alfred Bennett  
Bob Casey United States Courthouse  
515 Rusk Street, Room 8631  
Houston, TX 77002-2600

Dear Judge Bennett:

I am writing to strongly recommend Ms. Karolyne E. Carloss for a clerkship in your chambers.

Let me start from the bottom line: Karolyn is an exceptional person and I have no doubt she will be an exceptionally bright and productive clerk. Let me explain, this rather grand claim.

I first met Karolyn when she took my Contracts class in Spring 2022. Her grade for the class was reasonably good (a B+). But it reflects neither her performance nor the impression she left. In the course of the twenty years I have been teaching at a top-rank Law School, I have met many bright, hardworking, and impressive students. But Karolyne is one of a handful who left a particularly distinctive mark. What struck me in class was a combination of personal maturity and intellectual curiosity. Karolyn is an extremely, pleasant, rounded, and levelheaded person. A glance at her resume shows that she has accomplished and experienced several impressive things in her life, which, are not exactly the standard boxes marked by the standard top law student. And this life experience is reflected in who she is. The most remarkable aspect of her class presence was her engaged and secure manner. Others were there to do well in their first-year class. She was there to learn. Which made any class interaction with her a joyful and usually productive moment.

When I needed a Research Assistant the following summer, it was this distinct class impression that informed my decision to offer the position to Karolyne, rather than a few other bright students who outperformed her grade-wise. I was not wrong. Karolyne has served as my R.A. for the last year and working with her was a delight. She took seriously and performed diligently the tasks I assigned. Some of which simply involved hard work and others were of the kind that required thought and synthetic abilities. Karolyne executed all of these tasks impeccably in a thorough, concise, and accessible manner. Above all, however, it was delightful to have an engaged and engaging interlocutor, curious, eager to learn, and quick to catch on.

This leads me back to where I started: my close work with her makes me certain that Karolyne will be an exceptional person to work with. She will be committed to getting the job done diligently and responsibly, but she will also offer a unique independent voice, sense, and extremely pleasant companionship. In short, she is the kind of person one would want by their side.

Please let me know if there is any further information I can provide.

Warm regards,

Oren Bracha  
William C. Conner Chair in Law  
The University of Texas School of Law

Oren Bracha - obracha@law.utexas.edu - 512-232-9325

June 11, 2023

The Honorable Alfred Bennett  
Bob Casey United States Courthouse  
515 Rusk Street, Room 8631  
Houston, TX 77002-2600

Dear Judge Bennett:

Karolyne Carloss is an exceptional human being. Her path forward is limitless. When you meet her, you can envision her future in the White House, on the Senate floor, in the Governor's mansion, or on a federal bench.

She has tremendous analytical skills, an incredible work ethic, and very, very good judgment. She is kind. She is compassionate. She is grounded. She is so enjoyable to work with in an office and in a courtroom. When you interview her previous employers, everyone feels the same way about her. She is that special.

Here is an excerpt from a job offer letter I wrote to Karolyne on August 9, 2022, at the end of her 1L internship with our Firm:

We have always surrounded ourselves with optimistic, lucky people. It creates a world view and working environment that we must always be appreciative for everything we have – and we never assume that it's because we're entitled or deserve it. We believe we have the best job – and the best profession – in the world. We love what we do, we love who we work with, and we love the people we serve.

We would love to work with you – whether it is immediately after law school, after a federal clerkship, or even years after working for another organization. This offer of employment is for whatever practice area you choose – civil plaintiff's work, indigent criminal defense, white collar criminal defense, or any practice area you want. . . . Your biggest challenge when graduating law school will be what to do next because you will have so many options.

I write to provide an explanation of why I offered a 1L an unconditional offer of employment having never made a similar offer in my career. I also write to explain why I am writing this recommendation letter for Karolyne instead of selfishly trying to persuade her to bypass the clerkship process and join our Firm.

Putting myself in your shoes, I would find it difficult to place the same weight on letters of recommendation compared to other parts of a clerkship application. A candidate's GPA, law school, undergraduate institution, and law review membership are objective. Cover letters and letters of recommendation are subjective.

I liken it most to a trial, where as a lawyer I often struggle most with handling character witnesses. Evidence of a client's integrity in certain cases can be a crucial element. But there always comes a point of diminishing marginal utility; after a second or third witness, the jury becomes bored, and a person's life's work fails to have the impact it deserves.

In wrestling with the best way to avoid this, I began to borrow a tool I learned from a family lawyer called the "Axis of Witness Significance." Family law attorneys face this problem in custody fights every day: Mom's lawyer calls a number of witnesses attesting to her good character; Dad's lawyer uses the same technique in opposition. So how does the decider of fact make an objective decision (custody) based upon subjective opinions (character opinion testimony)? Under this rubric, the advocates urge the Judge to weigh the following qualities of the character witness's testimony:

1. Scope of Personal Knowledge
2. Actual or Implied Bias
3. Credentials of Discernment

Having found it helpful in trial, I'm going to apply this rubric here, to analyze my inherently subjective recommendation for Karolyne Carloss and give it weight in your ultimate determination that she will be a clerk you wish to employ for the next one to two years.

#### **Scope of Personal Knowledge of Karolyne Carloss**

I know Karolyne in three different capacities: as her former employer, as a lawyer that worked alongside her in a federal jury trial, and as her law professor.

**Employer.** We are a small law firm in Austin. We do not have a summer clerkship program. Karolyne reached out to one of the lawyers in our Firm inquiring about mentorship and the possibility of a 1L summer clerkship. When the lawyer raised the issue about possible summer clerkships during our weekly Firm meeting, I immediately dismissed the idea. Our previous 1L summer interns required a tremendous amount of supervision and I selfishly didn't want the responsibility of making arrangements or prevent taking a summer vacation.

As a UT Law alumni, the lawyer had a Zoom meeting with Karolyne for mentorship purposes. He did not, however, convey that we weren't open to 1L summer clerkships.

"I think you should meet her before you tell her no," lawyer Worth Carroll explained. "She's different."

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I was unpersuaded. "I. Don't. Want. An intern. This summer."

Worth lobbied my law partner (and wife) Corinne Sumpter behind my back. "You should meet her – for no other reason than to help the law students coming out of Covid trying to find their footing in the profession." Corinne agreed, and she and Worth had another meeting with Karolyne.

In the weeks that followed I kept hearing the whispers and buzz about Karolyne. Corinne was now calling Karolyne's references over my repeated objections.

"I just finished a call with the Superintendent from Van Horn, Texas," Corinne explained to the rest of the staff as I was ignoring her as I didn't want a summer intern. "I couldn't get him off the phone. Do you know that Karolyn came into town because her fiancé was working for Jeff Bezos' space exploration company Blue Origin? And she completely revamped the funding and grants for their school system so that low income kids could be trained to work in aerospace engineering? And then she ran and was elected to Van Horn City Council?"

No, I did not know that. And what did that have to do with our summer internship in a law firm?

I learned that Karolyne worked for a number of years at the Bill and Melinda Gates Foundation in the field of international microfinancing. I learned that Karolyne managed \$450,000,000.00 in active investments to integrate health services in Ethiopia, Kenya, and India. I learned that after moving to Van Horn in 2018, she quickly secured \$825,000.00 in grant funding for underrepresented rural students, and then she established a \$10,000,000.00 Van Horn Education Foundation to fully finance associate degrees and industry certifications for all high school students in the district by 2035. (When Karolyne left Van Horn to attend law school, the endowment plan was already 75% funded). I learned that Karolyne ran for City Council in 2019 and won an at-large election over two incumbents and three other candidates to become the youngest and only female council member. I learned that what prompted her to apply for law school was a disagreement with restructuring the tax base for the city of Van Horn.

I learned that I was quite impressed – and perhaps even intimidated – by this person. She was a bit different than most 1Ls. She was a bit different from everyone. It seemed as if I was the one that needed to ask her for mentorship.

I met her. Within a few minutes, I understood. We hired her. Corinne and Worth let me believe it was my decision, but I'm fairly confident they already extended Karolyne an invitation and then allowed me to think I had the final say. Karolyne was a fantastic addition to our team. Everyone loved her (as well as her fiancé Eddie). When she returned to law school in the Fall there were frequent sighs that the office wasn't as fun without Karolyne. Eddie, an actual rocket scientist, still visits our employees' preschools to teach kids about space exploration.

These are exactly the type of folks you want as part of your work family. Karolyne came to work early, stayed late, was self-directed, and was confident in her work product yet always sought to understand more. She mentored legal assistants and college interns. She was deferential to paralegals and sought their help and expertise. She blended into our office seamlessly within a matter of days. We frequently forgot that she was a law student as she has the judgment and wisdom and thoughtfulness of a person with significant professional experience in the world.

Supervising Trial Lawyer. We receive CJA Appointments, and Karolyne actively participated in the trial preparation and sat at counsel table as our third chair in United States v. Maximino Majano-Martinez, Cause No. 1:20-CR-00290-LY. Karolyne met with the client for the weeks heading into trial, drafted our proposed jury charge, and provided valuable insights from when she had served on a federal criminal jury on a similar case.<sup>(1)</sup> Karolyne's legal research and briefing was instrumental during the charge conference for a Pennington instruction (jury charge on knowledge element when drugs are concealed and the government must show more than mere possession). Throughout the trial she anticipated what needed to be researched or drafted and was an active participant as part of the trial team. During the many long hours and late nights Karolyne was focused, engaged, and invested in the work. Rarely did we have to delegate many matters to her; she was part of the case meetings and volunteered for tasks (and then some) on her own accord.

Karolyne is a lawyer who I would want to try many, many cases with (and as her second chair).

Professor. After her 1L summer internship, Karolyne was in my Trial Advocacy class this past Fall. She diligently attended class, participated when she was on-call, and performed well on the Final Exam. I had a chance to observe Karolyne during her final trial. She was paired up against an exceptional opposing team – they had just won a national championship – and Karolyne admitted that she was nervous. And, to be candid, it showed. Karolyne is comfortable in discussions and law and motions argument, but witness examinations are a skill she has not developed. She has excellent credibility in the courtroom and her responses to objections were good. She has room for growth in her trial advocacy.

### **My Actual or Implied Bias**

I am not related to Karolyne and only know her through work. Karolyne will be an exceptional lawyer, and I want her to have the best education possible. I believe Karolyne would greatly benefit from a clerkship, and I believe she would be a benefit to your chambers. I regret my decision not to apply for clerkships, and I encouraged Karolyne to not make the same professional mistakes that I did.

My actual bias is that I want Karolyne to join our Firm. However, I am aware that Karolyne is destined for greater and larger things

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than working for a tiny Firm in Austin, and I'm just grateful that we had the chance to spend time with her along her professional journey.

(1) When she lived in West Texas Karolyne was called to jury duty and was elected the foreperson of the jury in *United States v. Mumphrey*, No. 04:20-CR-00413-DC (W.D.T.X. Dec. 15, 2020).

### My Credentials of Discernment

Evaluating law students. For the past decade I have served as an adjunct at the University of Texas School of Law. Every semester, every year I teach a class ranging between 30 and 60 students, lecturing twice a week to the whole group, as well as working with students in small group evening sessions. I have reviewed written assignments. I have graded final exams. I have worked with students and been a guest lecturer in the Domestic Violence Clinic, Criminal Defense Clinic, Advanced Prosecution Clinic, and Federal Prosecution Clinic.

Evaluating lawyers. I was appointed by the Supreme Court of Texas to serve on the Board of Disciplinary Appeals, a statewide 12-member body that resolves attorney discipline cases. We preside at the Supreme Court. I served for 6 years, and in my final year, I was elected Chair of the Board. I have also served in a similar capacity in the federal court system, as Chair of the District Disciplinary Committee for the Western District of Texas.

Evaluating employees. I foolishly hung out a shingle out of law school, and I have 22 years of experience hiring, managing, and firing employees. Over the past 20 years, we have employed over 120 professionals. She is one of the favorite persons that has worked here.

Evaluating work product and analysis. In evaluating Karolyne's work product I compare her not only to other summer law clerks (1Ls and 2Ls) but also associate attorneys we have worked with over the years. Her work is on par or greater than many practicing attorneys.

With recognition of the incessant demands for your attention, a few minutes spent interviewing Karolyne will be an enjoyable investment. To make matters easier for you, I took the liberty of asking several questions of her that may be helpful:

Why are you seeking a federal district court clerkship?

"I want to be a trial lawyer. (2) When a client comes into the office with a problem, I want to know how to solve it. You need to develop research and writing skills to be a great trial lawyer.

"One thing that makes a great trial lawyer is one who can make an argument for both sides. I think a clerkship gives you this: to be able to thread the needle of this case; to understand both sides. I see that experience as being invaluable in my future practice."

(2) After our jury trial this summer Judge Yeakel kindly met with law student interns from the U.S. Attorney's Office and invited Karolyne to attend a debriefing after the trial, too. He told the students, "There's a difference between being a litigator and being a trial lawyer. They aren't the same thing."

What can you offer a judge's chambers?

"Doggedness. I want to do the work.

"I am interested in the issues that come before federal courts. I want to draft smart and thoughtful opinions. I am not taking this job for the next rung or a Firm signing bonus; I want the experience and mentorship.

"I want to go from clerkship to courtroom. Hopefully in the same community, but I really care about the rigor and integrity of trying cases."

Why you?

"I've had lots of bosses. I've met a lot of deliverables. I've worked in a lot of industries. I don't feel intimidated. I can do a job if given the task. I know when to check back in when I need help. I can responsibly handle tasks.

"I think I'm an adult who can work. I can get along with everyone and row together as a team. I don't require handholding. I meet deadlines."

What I love about Karolyne's answers is there is no puffery or flattery or prose. She is result-oriented. She knows her role. She is a person that gives more than she takes. She is the clerk who will show up at 3:00 a.m. on the side of the road when you have a flat tire and there are no tow trucks - with a smile on her face and a fresh cup of coffee for you because it was such a rough night. She is the clerk who will do any task that benefits the Court because no job is beneath her. She is the clerk who will treat the custodial staff with the same dignity and friendly demeanor as she treats foreign dignitaries. She is an exceptional human being. If I never have the opportunity to work with Karolyne again, I consider myself so lucky to have spent a summer with her.

Thank you so much for your consideration of her candidacy. I welcome the chance to visit further or provide you with any

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additional information about Karolyne.

Very truly yours,

David M. Gonzalez

David Gonzalez - david@sg-llp.com